

MAR 30 2005

JOHN F. CORCORAN, CLERK
BY: *Kelly Brown*
DEPUTY CLERK

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA

~~Lynchburg~~ ^{Roanoke} Division

WILLIAM WALLIS,
Plaintiff,

v.

EASTERN MANUFACTURING CORPORATION,
BOSS MANAGEMENT GROUP, INC.,

FABRIKO, INC.,

PACIFIC ATLANTIC HOLDINGS LIMITED,

and

ROBERT NITTI,

Defendants.

Civil Action No.

7:05CV00174

COMPLAINT

COMES NOW the plaintiff, by counsel, who hereby moves this Court to enter a declaratory judgment to determine that the plaintiff is the owners of the defendant corporate entities Boss Management Group, Inc., Fabriko, Inc., and Pacific Atlantic Holdings Limited, as described herein.

SUBJECT MATTER JURISDICTION

1. This Court has jurisdiction to enter a declaratory judgment pursuant to 28 U.S.C. § 2201.

PERSONAL JURISDICTION

2. This Court has personal jurisdiction over this matter because the defendants are Virginia corporations with registered offices in Roanoke, Virginia.

STATEMENT OF FACTS

3. Defendant Eastern Manufacturing Corporation is a Virginia corporation, registered with the Virginia State Corporation Commission.

4. Defendant Boss Management Group, Inc. is a Virginia corporation, registered with the Virginia State Corporation Commission.

5. Defendant Fabriko, Inc. is a Virginia corporation, registered with the Virginia State Corporation Commission.

6. Defendant Pacific Atlantic Holdings Limited is a Virginia corporation registered with the Virginia State Corporation Commission.

7. The plaintiff William Wallis is the incorporator and the owner of all of the stock of Boss Management Group, Inc., Fabriko, Inc., and Pacific Atlantic Holdings Limited.

8. Robert Nitti is the incorporator and the owner of all of the stock of Eastern Manufacturing Corporation and claims an ownership interest Boss Management Group, Inc., Fabriko, Inc., and Pacific Atlantic Holdings Limited.

CLAIM FOR RELIEF

(DECLARATORY JUDGMENT)

9. The allegations of paragraph 1-8 are adopted herein.

10. The plaintiff, William Wallis, is entitled to a declaratory judgment that (1) he is the incorporator and the owner of all of the stock of Boss Management Group, Inc., Fabriko, Inc., and Pacific Atlantic Holdings Limited, and that (2) Robert Nitti is the incorporator and owner of all of the

stock of Eastern Manufacturing Corporation.

WHEREFORE the plaintiff prays that this Court will enter an order declaring that William Wallis is the incorporator and the owner of all of the stock of Boss Management Group, Inc., Fabriko, Inc., and Pacific Atlantic Holdings Limited, and that (2) Robert Nitti is the incorporator and owner of all of the stock of Eastern Manufacturing Corporation.

Respectfully Submitted,

WILLIAM WALLIS

By: 

Darren Delafield
VSB No. 35981
16-B Kirk Avenue
Roanoke VA 24011
Tel: (540) 342-7782